

**DECLARATION**

This affidavit is submitted in support of a complaint for forfeiture of \$2,200.00 in United States Currency.

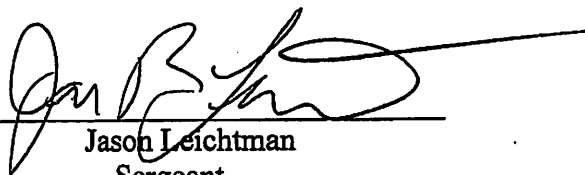
I, Jason Leichtman, Sergeant of the Maryland State Police, submit that there are sufficient facts to support a reasonable belief that the \$2,200.00 in United States Currency constitutes: (1) money, negotiable instruments, securities and other things of value furnished and intended to be furnished in exchange for a controlled substance in violation of the Controlled Substances Act; (2) proceeds traceable to such an exchange; and (3) money, negotiable instruments, and securities used and intended to be used to facilitate a violation of the Controlled Substances Act in violation of 21 U.S.C. § 841. Thus, the \$2,200.00 is subject to forfeiture pursuant to 21 U.S.C. § 881(a)(6).

- a. On November 2, 2012, Trooper First Class (TFC) Chatfield of the Maryland State Police, Golden Ring Barrack, responded to 911 call regarding a collision on the outer loop of I-695, just prior to Exit 15 (U.S. Route 40/Baltimore National Pike). The trooper observed a 2006 Chevrolet Aveo, with Pennsylvania registration HVP 6888, (the "vehicle"), in Baltimore County, Maryland. Sandra Rust ("Sandra Rust") was identified as the driver. Samuel Rust was identified as the passenger.
- b. The vehicle is registered to Sandra Rust.
- c. While conversing with Sandra Rust, TFC Chatfield noted that her speech was slow and slurred and she had blood shot and glassy eyes.
- d. Sandra Rust advised that she was involved in an accident and she was the driver.
- e. When TFC Chatfield asked Sandra Rust if she had been drinking, she stated, "No."

- f. TFC Chatfield asked Sandra Rust if she had used any drugs, either prescription or illegal, and Sandra Rust stated that she took her prescribed Oxycodone, but could not remember how many she took or how long ago before the collision she took them.
- g. Both Sandra Rust and Samuel Rust were transported to the University of Maryland Shock Trauma (Shock Trauma) by Baltimore County Fire Department Medic 13.
- h. Samuel Rust died at Shock Trauma from injuries sustained in the accident.
- i. Based on the fatal collision and probable cause that Sandra Rust was driving under the influence, Trooper (Tpr.) Stakias responded to Shock Trauma and advised Sandra Rust of her Miranda Rights.
- j. Tpr. Stakias advised Sandra Rust that he need to positively identify her and asked where her license was located.
- k. Sandra Rust advised that her license was in her purse.
- l. Tpr. Stakias searched Sandra Rust's purse and located seven (7) individually wrapped bundles of heroin (2 grams), \$2,200.00 in U.S. Currency, a digital scale with CDS residue, a five (5) inch glass mirror, an empty orange prescription bottle labeled Oxycodone and an orange prescription bottle labeled Diazepam containing eighteen (18) pills.
- m. During questioning, Sandra Rust advised that she and Samuel Rust are both occasional users of heroin and consume it via snorting.
- n. Sandra Rust stated that the were traveling from Cumberland, MD to Baltimore, MD to party with some friends.
- o. Sandra Rust stated that she couldn't remember how many Oxycodone pills she consumed, whether it was two (2) or three (3).

- p. Sandra Rust admitted that she has been arrested in the past for CDS possession.
- q. Once released from Shock Trauma, Sandra Rust was charged with Possession of Heroin With the Intent to Distribute, Possession of Heroin and Possession of Drug Paraphernalia.
- r. A criminal history check was conducted Sandra Rust. Sandra Rust has two (2) prior arrests, including one (1) prior arrest for Possession of CDS.
- s. A criminal check was conducted on Samuel Rust. Samuel Rust has three (3) prior misdemeanor arrests for Possession of CDS.
- t. A check for wages and employment was conducted for Rust and Samuel Rust through all fifty (50) states. No earnings could be located for either Rust or Samuel Rust.

I DECLARE UNDER PENALTY OF PERJURY PURSUANT TO TITLE 28 U.S.C. 1746 THAT THE FACTS SUBMITTED BY THE MARYLAND STATE POLICE, IN REFERENCE TO THE SEIZURE OF \$2,200.00 U.S. CURRENCY FROM SANDRA D. RUST ARE ACCURATE, TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION AND BELIEF.

  
Jason Leichtman  
Sergeant  
Drug Enforcement Administration